

**UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 16**

ADT, LLC	§	
	§	Cases 16-CA-144548
Respondent,	§	16-CA-168863
	§	16-CA-172713
and	§	16-CA-179506
	§	16-CA-189805
COMMUNICATIONS WORKERS OF	§	16-CA-187497
AMERICA, AFL-CIO,	§	16-CA-191963
	§	16-CA-199947
Charging Party.	§	16-CA-200961
	§	16-CA-209070
	§	16-CA-209995
	§	

**CHARGING PARTY COMMUNICATIONS WORKERS OF AMERICA, AFL-CIO'S
UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE BRIEFS WITH THE
ADMINISTRATIVE LAW JUDGE**

TO THE HONORABLE ADMINISTRATIVE LAW JUDGE ROBERT A. RINGLER:

COMES NOW Charging Party Communications Workers of America, AFL-CIO (hereinafter "Charging Party") and pursuant to Rule 102.2(c) of the Rules and Regulations of the National Labor Relations Board, files this unopposed motion for an extension of time to June 15, 2018 to file closing briefs with the Administrative Law Judge and in support thereof would respectfully show the following:

1. This case involves complex issues of law under the National Labor Relations Act concerning withdrawal of recognition. Additionally, this case includes an unlawful termination allegation, three (3) allegations of unlawful threats and coercion, approximately ten (10) allegations of unilateral changes, and approximately twenty (20) allegations concerning the unlawful refusal to provide information.

2. Briefs in this case are currently due on Friday, June 1, 2018.

3. Following the closure of the hearing in this case on May 1, 2018, Counsel for Charging Party had an unexpected professional matter arise that required a significant commitment of his time, which diverted him from the research and preparation necessary for the closing brief.

4. Accordingly, Charging Party hereby moves for a fourteen (14) day extension of the deadline to file closing briefs in this case to Friday, June 15, 2018 for all parties.

5. This request is not sought for the purposes of delay or hindrance, but rather to provide Counsel for Charging Party adequate time to prepare a brief to address the complex issues of labor law concerning the withdrawal of recognition as well as the approximate thirty-four (34) additional allegations in the complaint so that the interests of justice may be done.

6. This is the first extension sought in this case by Counsel for Charging Party.

7. Counsel for Charging Party has conferred with Counsel for the General Counsel and the General Counsel does not oppose this motion seeking to extend the deadline for filing briefs to June 15, 2018. Counsel for Charging Party has also conferred with Counsel for the Respondent and he indicated that he too did not oppose this motion seeking to extend the deadline for filing briefs to June 15, 2018. As such, no party will be prejudiced by this extension of time.

WHEREFORE, PREMISES CONSIDERED, Charging Party respectfully prays that this unopposed motion be granted and the deadline for all parties to submit briefs to the Administrative Law Judge in this case be extended to Friday, June 15, 2018, and that Charging Party be granted such other relief, at law or in equity, to which it is justly entitled.

Respectfully Submitted,

DAVID VAN OS & ASSOCIATES, P.C.

By: /s/ Matt Holder
Matt Holder
8626 Tesoro Dr., Ste. 510
San Antonio, Texas 78217
Telephone: 210/824-2653
Facsimile: 210/824-3333
matt@vanoslaw.com

Counsel for Charging Party

CERTIFICATE OF CONFERENCE

This section is to certify that Counsel for Charging Party conferred by email with Counsel for the General Counsel on May 16, 2018 concerning the relief sought in this motion and Counsel for the General Counsel indicated he did not oppose the relief sought in this motion. Counsel for Charging Party also conferred with Counsel for Respondent by email on May 17, 2018 concerning the relief sought in this motion and Counsel for Respondent indicated he did not oppose the relief sought in this motion.

/s/ Matt Holder
Matt Holder

Counsel for Charging Party

CERTIFICATE OF SERVICE

This is to certify that service of the above and foregoing Instrument has been effected electronically to the parties below on May 17, 2018 as follows:

The Honorable Timothy Watson
Regional Director
National Labor Relations Board, Region 16
819 Taylor Street, Rm. 8A24
Fort Worth, TX 76102-6178
Timothy.Watson@nlrb.gov

Arturo Laurel
Maxine Gallardo
National Labor Relations Board, Region 16
819 Taylor Street, Rm. 8A24
Fort Worth, TX 76102-6178
Arturo.Laurel@nlrb.gov
Maxie.Gallardo@nlrb.gov

Counsel for the General Counsel

Jeremy C. Moritz
Norma Manjarrez
Ogletree, Deakins, Nash, Smoak & Stewart, P.C.
155 North Wacker Dr., Ste. 4300
Chicago, IL 60606-1731
jeremy.moritz@ogletreedeakins.com
norma.manjarrez@ogletreedeakins.com

Counsel for Respondent

/s/ Matt Holder
Matt Holder

Counsel for Charging Party